

1 JUDGE BENJAMIN H. SETTLE
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA
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12 UNITED STATES OF AMERICA,) No. 18-CR-5141 BHS
13 Plaintiff,) DEFENDANT'S MOTION TO
14 v.) MODIFY CONDITIONS OF
15) APPEARANCE BOND
16 DONNIE BARNES, SR.,) Noted for: October 25, 2019
17 Defendant.)
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19 Donnie Barnes, Sr., by and through his attorneys, Mohammad Hamoudi and
20 Gregory Murphy, hereby requests that his appearance bond be modified to substitute a
21 daily electronically monitored curfew for home detention, that requires that Mr. Barnes
22 be at his residence "at all times except for employment, religious services, medical,
23 legal reasons or otherwise approved by the location monitoring specialist."

24 On March 13, 2019, Mr. Barnes' attorney, Assistant Federal Public Defender
25 Colin Fieman, submitted a motion to modify Mr. Barnes' bond requirement to allow
26 him a curfew where he would remain home between the hours of 6:00 p.m. and 9:00
a.m. (Dkt. No. 28). On March 25, 2019, the Court denied the motion (Dkt. No. 30).

27 Mr. Barnes has now been released on Bond for 19 months (March 12, 2018). He
28 has been and continues to be in full compliance with all terms of the appearance bond.
29 His probation officer, John Moore, indicates that Mr. Barnes has been fully compliant
30 with the LM program and other conditions of his bond since his release from custody
and does not oppose this motion for modification of bond conditions.

1 It is respectfully requested that he Court modify Mr. Barnes' appearance Bond to
2 require that he remain home between 6:00 p.m. and 9:00 a.m.

3 DATED this 11th day of October, 2019.

4 Respectfully submitted,

5 s/ *Mohammad Ali Hamoudi*
6 s/ *Gregory Murphy*
7 Attorneys for Donnie Barnes, Sr.
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CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

s/ *Charlotte Ponikvar*
Paralegal
Office of the Federal Public Defender